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March 2, 2016
LETTER-MOTION – FILED VIA ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: ***Johnson v. FlexCo, LLC et. al.***
Civil Action No. 15-cv-7530 (RA)
Letter-Motion to Stay Proceedings

Dear Judge Abrams,

We represent the Plaintiff, Eric Johnson ("Plaintiff"), in the above-captioned action. Pursuant to Rules 5.2 and 7.1 of the Local Rules of the U.S. District Court for the Southern District of New York, Rule 13.1 of the Electronic Case Filing Rules & Instructions of the U.S. District Court for the Southern District of New York, and the Individual Rules & Practices in Civil Cases of Your Honor, Plaintiff, by and through his undersigned attorney, hereby respectfully moves the Court for issuance of a 30-day stay of proceedings. The basis for this request is that, since the filing this morning of Plaintiff's letter-motion to adjourn the Initial Pretrial Conference (*see* Docket No. 28), the parties have reached a settlement in principle, and are in the process of negotiating final settlement terms.

We respectfully ask that this case be stayed rather than discontinued, as the parties intend to request that the Court retain jurisdiction to enforce their settlement agreement. (In accordance with Your Honor's Individual Rules & Practices in Civil Cases, a copy of the settlement agreement will be provided to the Court for endorsement or included in the stipulation of settlement and dismissal.)

Thank you for your time and consideration.

Very truly yours,

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